IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS **AUSTIN DIVISION**

AMANDA VALENZUELA,	§
fka JANE UTAUS-VA DOE	§
Plaintiff	§
vs.	§
	§ C.A. No. 1:19-cv-01202-RP
THE UNIVERSITY OF TEXAS	§
AT AUSTIN and JOHN CLARK	§
Defendants	§

AGREED JOINT MOTION FOR EXTENSION OF CERTAIN DEADLINES

COME NOW, Plaintiff AMANDA VALENZUELA and Defendants The University of Texas at Austin and John Clark to file this "AGREED JOINT MOTION FOR EXTENSION OF CERTAIN DEADLINES" ("Motion") as follows:

Pending before this Court is the following motion filed by Defendants 1. on August 18, 2020:

DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S SECOND-AMENDED COMPLAINT

(hereafter, "MTDismiss"). (ECF #27).

- Defendants' MTDismiss is extensive, containing numerous exhibits of 2. supporting documentation.
- The deadline for Plaintiff to respond to Defendants' MTDismiss was 3. September 1, 2020.

- Upon Plaintiff's request to Defendants for an extension to respond to 4. Defendants' MTDismiss, Defendants stated no objection but also requested an extension of Defendants to file a reply ("Reply") to Plaintiff's Response, to which Plaintiff has no objection.
- Therefore, Plaintiff and Defendants are now requesting the following 5. extended deadlines:
 - Plaintiff's deadline to respond to Defendants' MTDismiss be a) extended to September 22, 2020; and
 - Defendants' deadline to file a reply to Plaintiff's response be b) extended to October 13, 2020.

(collectively, "Deadlines").

Plaintiff and Defendants' joint request is being made not for delay, but 6. so that justice may be done.

WHEREFORE, Plaintiff and Defendants respectfully request that the Court grant this Motion and extend the Deadlines as set forth above.

Respectfully submitted,

Gorman Law Firm, pllc

Terry P Gorman, Esq. Texas Bar No. 08218200 tgorman@school-law.co

901 Mopac Expressway South, Suite 300

Austin, Texas 78746

Telephone: (214)-802-3477 (direct)

Telecopier: (512) 597-1455

ATTORNEYS FOR PLAINTIFF AMANDA VALENZUELA

TEXAS ATTORNEY GENERAL

By: __//Summer R. Lee//_ SUMMER R. LEE **Assistant Attorney General** General Litigation Division P.O. Box 12548 **Capitol Station Austin** Texas 78711-2548 summer.lee@oag.texas.gov ATTORNEYS FOR DEFENDANT THE UNIVERSITY OF TEXAS AT **AUSTIN and JOHN CLARK**

CERTIFICATE OF CONFERENCE

The undersigned certifies that on the 2nd of September 2020, I communicated with counsel for Defendants as to the foregoing request for relief, and Defendants joint the relief requested.

CERTIFICATE OF SERVICE

This is to certify that on the 4th day of September 2020, a true and correct copy of the above and foregoing was forwarded to all counsel of record in accordance with the Federal Rules of Civil Procedure utilizing the VIA CM/ECF filing system being:

SUMMER R. LEE ANA ARANDA **Assistant Attorney General** General Litigation Division P.O. Box 12548 **Capitol Station Austin** Texas 78711-2548 summer.lee@oag.texas.gov Ana.Aranda@oag.texas.gov

ATTORNEYS FOR DEFENDANT THE UNIVERSITY OF TEXAS AT AUSTIN and JOHN CLARK